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Attorneys for Defendants Patrick Allen, Sajel Hathi, Dolores Matteucci, and Sara Walker

### IN THE UNITED STATES DISTRICT COURT

### FOR THE DISTRICT OF OREGON

#### PORTLAND DIVISION

DISABILITY RIGHTS OREGON, METROPOLITAN PUBLIC DEFENDER SERVICES, INC., and A.J. MADISON,

Plaintiffs,

v.

SAJEL HATHI, in her official capacity as head of the Oregon Health Authority, and SARA WALKER in her official capacity as Interim Superintendent of the Oregon State Hospital,

Defendants.

JAROD BOWMAN, JOSHAWN DOUGLAS-SIMPSON,

Plaintiffs,

v.

Case No. 3:02-cv-00339-AN (Lead Case) Case No. 3:21-cv-01637-AN (Member Case) Case No. 6:22-CV-01460-AN (Member Case)

DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF DISABILITY RIGHTS OREGON'S PETITION FOR ATTORNEY FEES

Case No. 3:21-cv-01637-AN (Member Case)

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CAS/j3b/994106080

Department of Justice 100 SW Market Street Portland, OR 97201 (971) 673-1880 / Fax: (971) 673-5000 SARA WALKER, Interim Superintendent of the Oregon State Hospital, in her official capacity, DOLORES MATTEUCCI, in her individual capacity, SAJEL HATHI, Director of the Oregon Health Authority, in her official capacity, and PATRICK ALLEN in his individual capacity,

Defendants.

LEGACY EMANUEL HOSPITAL & HEALTH CENTER d/b/a UNITY CENTER FOR BEHAVIORAL HEALTH; LEGACY HEALTH SYSTEM; PEACEHEALTH; and PROVIDENCE HEALTH & SERVICES OREGON,

Plaintiffs,

v.

SEJAL HATHI, in her official capacity as Director of Oregon Health Authority,

Defendant.

Case No. 6:22-CV-01460-AN (Member Case)

# CERTIFICATE OF CONFERRAL

Pursuant to L.R. 7-1(a), the undersigned counsel for Defendants certifies that she conferred with counsel for Plaintiff Disability Rights Oregon (DRO), and Plaintiff DRO does not oppose this motion.

# **MOTION**

Defendants seek an additional two weeks to respond to Plaintiff DRO's *Petition for Attorney Fees and Costs* (ECF No. 613), filed June 20, 2025. Defendants request this additional time because they are in discussions with Plaintiff DRO with the goal of reaching agreement regarding the amount of attorney fees at issue and would like to ensure the parties have enough time to complete those discussions before filing a response. The current deadline for Defendants' response to Plaintiff DRO's fee petition is July 7, 2025.

Accordingly, Defendants request that that deadline be extended to **July 21, 2025**. This is Page 2 - DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF DISABILITY RIGHTS OREGON'S PETITION FOR ATTORNEY FEES

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Department of Justice 100 SW Market Street Portland, OR 97201 (971) 673-1880 / Fax: (971) 673-5000 Defendant's first request for an extension of this deadline, and it is made in good faith and not to cause undue delay.

DATED July <u>1</u>, 2025.

Respectfully submitted,

DAN RAYFIELD Attorney General

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DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF DISABILITY RIGHTS OREGON'S PETITION FOR ATTORNEY FEES

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